

Tenneco Minerals
A Tenneco Company

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DOGM
MINERALS PROGRAM
FILE COPY

May 1, 1991

*Lyle Stott inspected
Goldstrike on May 7, 1991
and gave Tenneco Minerals
authorization to begin
adding cyanide.*

Mr. Don Ostler, Executive Secretary
Utah Bureau of Water Pollution Control
288 North 1460 West
P.O. Box 16690
Salt Lake City, UT 84116-0690

Re: Request for Expedited Review
Permission to Resume Cyanide Addition
Review of Item No. 5
Notice of Violations and Order Docket No. I91-03

Dear Mr. Ostler:

In accordance with item number 5 of the order contained in the above referenced Notice of Violations and Order, Tenneco Minerals hereby requests approval to add cyanide to process fluids. Tenneco Minerals is confident that it is safe to resume operations for the following reasons:

- a) Tenneco Minerals has successfully modified its two primary solution ponds (Barren and Pregnant) to a triple-lined pond system consisting of:
 - 1) An 80 mil HDPE primary liner;
 - 2) A geo-net drainage system with leachate recovery sump and warning device;
 - 3) A 60 mil HDPE secondary liner; and
 - 4) 18 inches of low permeability clay acting as a tertiary liner.
- b) Inspections of both primary solution ponds confirm that the underlying clay liner is intact and specifically:
 - 1) There was no damage to the Pregnant solution pond below the solution level that existed in the pond after the blast incident. The clay liner was hard and its integrity had not been compromised.
 - 2) Inspections of the Barren solution pond indicated there were only three holes below the solution levels. The clay liner, although generally moist for the first 1 - 3 inches, was hard and had not been compromised.

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Sampling of the clay liner was conducted at eleven locations to verify its integrity and to determine the potential extent of contamination.

Chemical analysis of samples from the clay liner indicated no detectable total cyanide below a depth of 6 inches and no total cyanide values in excess of 5 ppm in any sample. The results of these analysis' will be submitted under separate cover.

- c) The process water pond has been successfully repaired with an 80 mil HDPE liner installed over the damaged FML. As per our previous notifications to the Bureau, Tenneco Minerals Company intends to upgrade the pond to a triple lined system with leachate recovery system in conjunction with the modification and expansion of the process water pond.
- d) Diversion ditches around all leach pads and facilities have been repaired and/or re-established to convey storm water around the process areas. Sizing calculations to accommodate the 100-year storm event will be provided in a separate letter.
- e) Tenneco Minerals has developed an inspection program for diversion structures as provided to the Bureau in response to item no. 2 of the above referenced notice of violation and order (dated April 25, 1991) a plan to inspect all diversion ditches. The letter provides in part that:

"...Tenneco Minerals plans to inspect diversion structures on a monthly basis. In addition, inspections will be conducted daily during storm events and immediately following storm events. A log of the inspections will be kept on file. As a result of the inspections, Tenneco Minerals will conduct routine maintenance on the storm water diversion structures as necessary."
- f) Two emergency storage ponds were constructed on permitted heap leach pad 1 to provide 2.5 million gallons of extra storage capacity to avoid emergency discharges to the sedimentation pond.

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- g) Tenneco Minerals currently has solution inventories in balance. Solution levels as of May 1, 1991 were:

Pregnant Pond:	300,000 gallons
Barren Pond :	350,000
Process Pond :	50,000
Pond #1 :	1,200,000
Pond #2 :	<u>700,000</u>
Total	2,600,000 gallons

Total available capacity before overflow is 5,320,000 gallons. Efforts will be directed to evaporate as much water as possible during the next several months. It is Tenneco Minerals intent to eliminate Pond #2 and reduce the pond inventory in pond #1 to less than 200,000 gallons.

- h) Tenneco Minerals has placed a 2-foot layer of overliner material over the exposed area of FML on Leach Pad 2. Further, this area is being loaded with ore which will prevent any substantial amount of rainfall from being directly added to pond solution inventories.

We would appreciate your expeditious review of the data provided above. Please contact me should any concerns arise.

Sincerely,

TENNECO MINERALS COMPANY



Ken A. Kluksdahl
Mine Manager

KAK:sfp